

examiner identifies a time period in Lamparter at column 4, lines 19-25. Each of the time periods identified in Lamparter in column 4 are variable times that are measured, not specified.

Claim 1, step (b), specifies evicting one entry that has remained unchanged for the time period. Lamparter is silent as to when documents are evicted. The examiner cites column 4, lines 19-43, which discusses hit rate, and when a document was last accessed, but the only reference to removing a document is in conjunction with a least-recently-used algorithm that is not used in the Lamparter method of figure 1.

Claim 1, step (d), requires changing the value of the time period specified in step (a). Regarding step (d), the examiner identifies another time interval in Lamparter that has nothing to do with any of the time periods identified by the examiner for step (a). There is no relationship between the times since a document has been accessed (column 4) and the time interval for adjusting parameters (column 6).

In Lamparter, figure 1, and the discussion of figure 1 in columns 5 and 6, a control parameter is changed, hit rate is measured over a specified time period, and the process is repeated for a different value of the control parameter. In claim 1 of the present application, changing the time period in step (d) is the variable that is being changed.

Claim 2 specifies measuring the rate of cache-to-cache transfers. Lamparter does not teach or suggest cache-to-cache transfers. Even though the examiner included claim 2 in the 35 U.S.C. § 102(e) rejection, there is no discussion of claim 2 in that section, and in the examiner's discussion of the 35 U.S.C. § 103 rejection, the examiner admits that Lamparter does not specifically teach cache-to-cache transfers.

Claim 4 specifies evicting from the cache memory, at least one modified entry that has remained unchanged for at least the time period. Regarding claim 4, the examiner does not cite any specific part of Lamparter, but instead states an unsupported conclusion. Applicant respectfully traverses. Lamparter deals with hit rates and whether documents have been accessed during a time period but Lamparter does not teach or suggest that the cache in Lamparter ever caches a modified document, much less a modified entry that has remained unchanged for at least the time period.

Regarding claim 2, 5, and 6, and 35 U.S.C. § 103, the examiner has not established a *prima facie* case for obviousness. The examiner has merely stated a conclusion without

providing any evidence in the prior art for modification. Claims 2, 5 and 6 specify evicting an entry that was received in a cache-to-cache transfer. The cache in Lamparter is for a Web-proxy server. There is no teaching or suggestion in the prior art that cache-to-cache transfers have any relevance whatsoever for a Web-proxy server.

This application is considered to be in condition for allowance and such action is earnestly solicited.

Respectfully submitted,

by A. W. Winfield

Augustus W. Winfield

Reg. No. 34,046

March 27, 2006

Fort Collins, CO 80528-9599

(970)-898-3142